



Association for Local Telecommunications Services

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RMETZGER @ALTS.ORG

RICHARD J. METZGER  
VICE PRESIDENT &  
GENERAL COUNSEL

March 16, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M St., N.W.  
Washington, D.C. 20054

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RECEIVED

MAR 16 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

- Re: (1) Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137;
- (2) Application by SBC Communications Inc., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Oklahoma, CC Docket No. 97-121;
- (3) Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208;
- (4) Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231;
- (5) Request for Expedited Letter Clarification--Inclusion of Local Calls to ISPs Within Reciprocal Compensation Agreements, CC No. 96-98/
- (6) Petition for Expedited Rulemaking - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98, RM-9101;
- (7) In the Matter of Expanded Interconnection with Local Telephone Company Facilities: CC Docket No. 91-141

Dear Ms. Salas:

On Thursday afternoon and Friday morning of March 12-13, members of ALTS and CompTel met with Commission staff from the Common Carrier Bureau and its Policy

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Division to discuss various matters involving Section 271 checklist compliance by Ameritech (see the attached attendance lists and items distributed at these meetings). Discussion on Tuesday included:

- I started the meeting by thanking the Commission and staff for their attention to the important issue of Section 271 checklist compliance, and expressed our willingness to provide whatever information the Commission might require. I pointed out that silence from the competitive industry concerning any particular issues did not constitute a legal waiver to raise those issues at any subsequent time, and I emphasized that there are practical reasons why new entrants do not -- and could not -- possess an exhaustive list of the particular action items Ameritech must take to achieve checklist compliance. The simple reason for this lack of knowledge is that while new entrants may have knowledge of certain obvious Ameritech process defects, they are necessarily unaware of any other process shortcomings that are likely currently concealed by primary defects. In short, there are no assurances that Ameritech would be in compliance with Section 271 even if it were to promptly implement every proposal offered at these meetings.
- Number administration, operator services, white pages, and E911 were addressed by Denise Clayton, Phil Thompson, Martha Schermer, Brad Evans, Les Hinton, Carl Jackson and Tom Allen, among others. Concerning E911, NEXTLINK asked that Ameritech divulge all engineering paradigms employed in E911 trunk design, rather than insist upon simplistic traffic assumptions. Concerning number administration, the competitive industry, including Carl Jackson, Tom Allen and myself, emphasized that incumbents such as Ameritech enjoy an embedded base of numbers that have never been groomed or reclaimed in any manner (unlike 800 numbers). The presence of this cushion of numbers shelters incumbents during NPA jeopardy situations even if nominally non-discriminatory procedures are used to allocate new numbering resources. As for white pages, Les Hinton discussed new entrants' inability to review draft white page listings in advance, to make the listing requests similar to those incumbent end users can make, or to use book scoping efficiently. Marsha Schermer requested better change management from Ameritech on various issues.
- Marsha Schermer indicated it was her understanding that Ameritech gave preferential treatment to the pole attachments of its affiliate, New Media.

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- Phil Thompson explained that NEXTLINK had not requested the Advanced Intelligent Network Service Creator Environment from Ameritech given the difficulty in provisioning simple POTS. Ameritech's refusal to provision number portability without advance approval of a cost recovery mechanism was discussed by Dan Gonzalez, Marsha Schermer, and Carl Jackson. RCF was condemned as an inadequate form of interim portability. Brooks discussed Ameritech's provisioning of route indexing.

- Loop provisioning issues were discussed in detail. Marty Clift distributed data showing that Ameritech's loop provisioning had declined in quality from earlier periods. He indicated that Ameritech demanded special construction fees from Brooks in situations where end users were not asked for such payments. The IDL\ IDSL situation was addressed in connection with the provisioning of unbundled copper data loops. Mr. Clift pointed out the situation could be improved greatly through creation of a "Customer Information Database" that would already contain all the facilities information, exact street address, billing name, etc., that is necessary for a prompt and accurate customer conversion.

Brad Evans of Phone Michigan spoke about a complaint just filed against Ameritech in Michigan concerning its loop provisioning. Rich Fruchterman and Phil Thompson also discussed loop quality, and pointed out how a "norm" for switch errors could be applied to trouble reports during the first 30 days trouble reports to isolate defects created in the Ameritech portion of loop provisioning.

Topics on Friday included:

- Problems with Ameritech OSS were discussed by Phil Thompson, Les Hinton, Denise Clayton, Rich Fruchterman, Marty Clift, and myself. Industry attendees expressed surprise at the claim that Ameritech had posted an EDI interface specification for UNE entrants on its webpage, and promised to provide feedback on this item ASAP. NEXTLINK pointed to the defects in the existing ASR process for ordering unbundled loops, and the several manual steps involved. Kelley Costello of LCI discussed the use of OSS for resale. Several participants discussed the lack of an appropriate definition of a "firm order commitment," and the problem of "from and to" orders.

- Interconnection issues were addressed by several competitive industry participants. Carl Jackson and Phil Thompson spoke about the merits of

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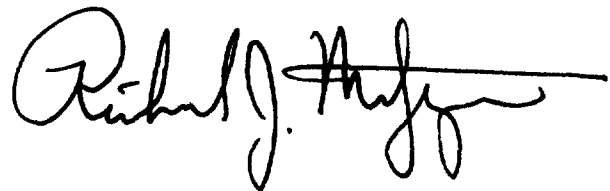
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measuring call attempts and completions in addition to call blocking. Carl Jackson explained how virtual trunk groups could be used to compare performance of trunk blocking between the same class of traffic for different companies on the same physical trunk group. Concerning the forecast issue, I pointed out that penalties exist for IXC forecasts which erroneously create needless ILEC expense, and that analogous processes could be created for Ameritech-CLEC interconnection. A handout from NEXTLINK was distributed.

- Collocation issues were addressed by Phil Thompson, myself, and other individuals. The participants agreed that collocation arrangements were arbitrary, overpriced, and unduly restrictive.
- The recombination of elements issued was discussed, with an emphasis on the difficulty of obtaining extended data loops. There was a discussion of the possible legal interpretations of the 8th Circuit's October 14th Order.
- Ameritech's refusal to comply with the MPSC's reciprocal compensation order was addressed.
- Kelley Costello and Les Hinton ended with a short discussion of resale issues.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard J. Hinton", with a long horizontal line extending from the end of the signature.

cc: FCC attendees (w/o attachments)

# 3/12/98 - Ameritech Collaborative Meeting

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Tom Allen	ICG	770-350-7307
Carl Jackson	ICG	770 350 7341
DAN GONZALEZ	NEXTELINK	202-721-0999
Don Shephard	Time Warner Comm.	203-328-4004
Marsha Rocky Schermer	Time Warner Comm.	(614) 358-4002
JASON OXMAN	FCC / Policy Div.	202-418-1078
Erin Duffy	FCC / CCB / Network Services	202 418 1685
David Kirschner	FCC / Policy Dir	202 418 0544
Susan Ranner	FCC Policy	418-7182
Melissa Newman	FCC / Policy	418-1580
Brad Evans	Phone Michigan	616 224 1600
Phil Thompson	NEXTELINK OHIO	614 416 1142
Deise Clayton	NEXTELINK "	614-416-1109
Marty Clift	BFC Wcom	616-224-4359
Rich FRUCHTERMAN	WORLD COM	202/776-1554
Genny Morelli	CompTel	202/296-6650
MARCIA JONES	WORLD COM	(630) 203-7020
Russell MEERBETH	WINSTAR	202/530-7059
Les HINTON	Win Star	703-261-0130
Richard Metzger	ALTS	202-969-2583
Jonathan Askin	CCB / Policy	418-2764
Jeannie Su	CCB / Policy	418-0491
Bill Bailey	CCB / Policy	418-7285
Jake Jennings	CCB / Policy	418-1580

3/13/98

Ameritech section 271 Collaborative Process

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Phil Thompson	NEXTLINK	614 416 1142
Carol Jackson	ICG	770-352-7341
Don Shephard	Time Warner	203-328-4004
Martin Schumacher	Time Warner	(614) 358-4002
Andrea Kearney	FCC/Policy Div	202 418 - 1580
JASON OXMAN	FCC/Policy Div	418-1078
<del>Kerry Conner</del>	LCI	703-610-3859
Debbie C Clayton	NEXTLINK OH	614 - 416 - 1109
PAN GONZALEZ	NEXTLINK	202 - 466 - 9755
Brent Olson	FCC/CCB/Policy	202-418-1580
JORDAN GULOSTEIN	"	418-2694
Wendy Lader	"	418-1381
Radhika Karmakar		418-1580
Douglas Galbi	FCC/CCB/Pricing	418-1556
Patrick DeGraba	FCC OPP	418-1328
John Jennings	FCC/Policy	418-1759
Melissa Neuman	FCC/Policy	418-1580
Brad Evans	Phone Michigan	818 224/600
Marty Clift	BFCWC	616-224-4359
RICH FAUCHTERMAN	WorldCom	202 776-1554
Dan DAVIS	INTERMEDIA comm.	813-829-6724
Marcia Jones	WorldCom	630-203-7021
Russ MERRITT	WinStar	702/530-7059
Les Hinton	WinStar	703-761-0180
Tom Allen	ICG	770-350-730
Ann Morelli	Comptel	202/296-6650

Michelle Carey

Ann Sean

Ed Keachmer

Pollay / CCB

Pricing / CCB

Pricing / CCB

418-1557

418-0447

418-0198

**BROOKS WORLD COM**

**SPECIAL CONSTRUCTION CHARGES**

<b>CUSTOMER NAME</b>	<b>NUMBER OF LOOPS</b>	<b>DATE SC CHARGES CONVEYED</b>	<b>AMOUNT</b>	<b>ACCEPTED YTD</b>
HIGHLIGHT INDUSTRIES	18	06/25/97	\$14,184.32	\$0.00
SEAN BROWER- BROWER SMITH COM	12	08/01/97	\$2,718.12	\$2,718.12
GRAND RAPIDS PUBLIC LIBRARY	26	08/07/97	\$1,733.58	\$4,451.70
ADVANTAGE HEALTH - SOUTHEAST	26	08/14/97	\$15,419.43	\$4,451.70
ADVANTAGE HEALTH - SOUTHEAST	48	08/15/97	\$15,419.43	\$4,451.70
ADVANTAGE HEALTH - SOUTHEAST	19	08/15/97	\$15,419.23	\$4,451.70
ABFS	6	08/19/97	\$3,288.60	\$7,740.30
INTERIOR DESIGN CONSULTANTS	1	08/19/97	\$332.00	\$8,072.30
LIFE EMS	2	08/26/97	\$1,088.67	\$9,160.97
ST. MARY'S AMBULATORY SERVICES	29	08/27/97	\$2,184.94	\$11,345.91
US XCHANGE	30	09/11/97	\$659.07	\$12,004.98
BOS DISTRIBUTING	3	09/12/97	\$1,073.93	\$13,078.91
DEWINTER & CRAIG INC	7	09/24/97	\$590.86	\$13,669.77
REFRIGERATION ENGINEERING	9	10/09/97	\$805.85	\$14,475.62
FIRST AMERICAN TITLE	8	10/16/97	\$329.16	\$14,804.78
ZINGER SHEET METAL	0	10/21/97	\$486.27	\$15,291.05
THE REC ROOM	14	10/23/97	\$7,567.84	\$22,858.89
REYNOLDS SAIL COMPANY	4	10/24/97	\$16,564.65	\$22,858.89
LDI PLASTICS	1 BRI	10/27/97	\$1,703.91	\$24,562.80
GILLESPIE DEVELOPMENT	2	11/06/97	\$1,527.89	\$24,562.80
GILLESPIE DEVELOPMENT AND MANA	2	11/06/97	\$1,527.89	\$24,562.80
FARM CREDIT SERVICES	20 + 4 DID	11/07/97	\$17,868.02	\$24,562.80
FARM CREDIT SERVICES	20 + 4 DID	11/07/97	\$9,260.20	\$24,562.80
FARM CREDIT SERVICES OF MICHIG	84	11/07/97	\$17,868.02	\$24,562.80
1ST AGENCY PROFESSIONALS	1	11/10/97	\$2,371.01	\$24,562.80
GILLESPIE DEVELOPMENT	2	11/13/97	\$816.47	\$25,379.27
1ST AGENCY PROFESSIONALS	1	11/24/97	\$562.72	\$25,941.99
INTEGRA PRINTING	1 BRI	11/26/97	\$803.09	\$26,745.08
INTEGRA PRINTING	1	11/26/97	\$1,434.33	\$28,179.41
DTS ARCHITECTS	6	12/01/97	\$760.54	\$28,939.95
FD HAYES ELECTRIC CO	3	12/09/97	\$549.09	\$29,489.04
1ST AGENCY PROFESSIONALS	1	12/12/97	\$1,497.10	\$29,489.04
MID STATE TITLE	1 BRI	12/17/97	\$1,368.39	\$30,857.43
J MOLLEMA & SON INC	12	12/18/97	\$6,419.31	\$37,276.74
SHOPPERS VIEW	7	12/18/97	\$637.87	\$37,914.61
SHOPPERS VIEW	15	12/18/97	\$637.87	\$38,552.48
COLDWELL BANKER/SCHMIDT	7	12/31/97	\$2,703.73	\$41,256.21
HOLLAND SPECIAL DELIVERY	1 BRI	12/31/97	\$1,508.67	\$42,764.88
LEAD SCREW INT'L	2	12/31/97	\$170.00	\$42,934.88
BRIARWOOD REALTY	22	01/02/98	\$4,473.90	\$47,408.78
RANCH RUDOLF	3	01/06/98	\$17,884.58	\$47,408.78
HELMHOLT & CO	1 BRI	01/09/98	\$973.44	\$48,382.22



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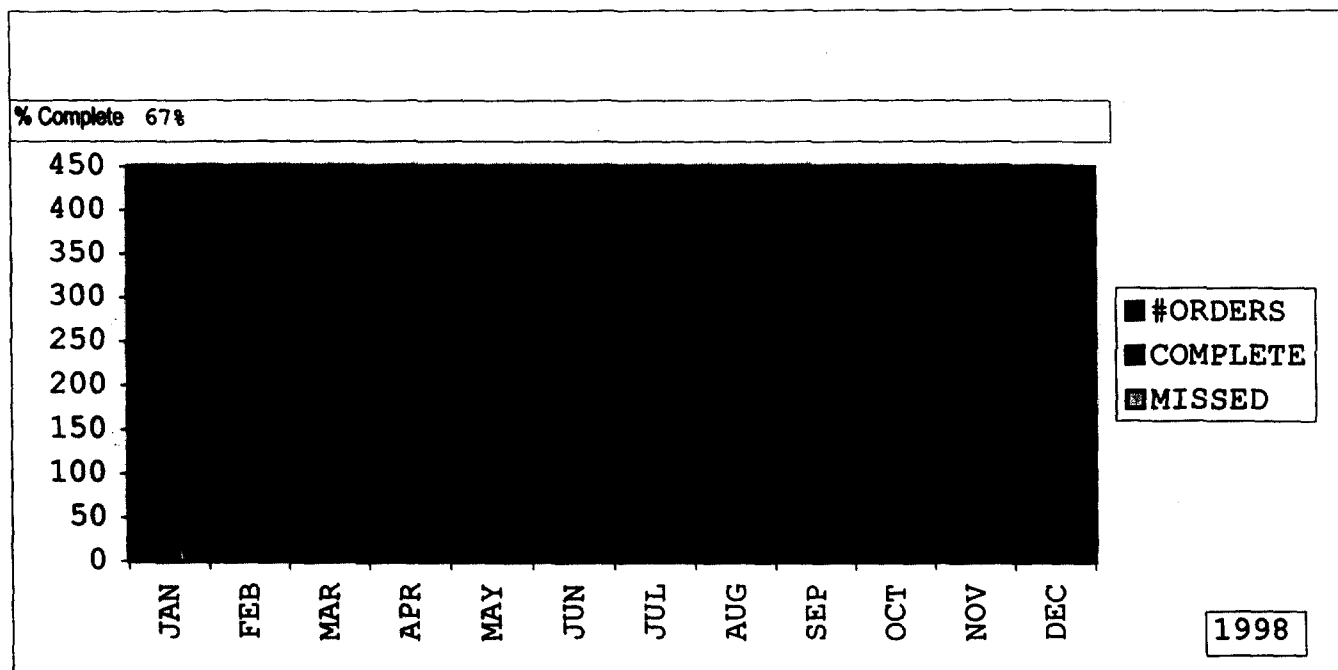
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**BROOKS WORLD.COM**

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MICHIGAN PUBLIC POWER AGENCY	2	01/21/98	\$1,347.05	\$48,382.22
1119 ADAMS ST LAW GROUP	7	01/22/98	\$4,979.93	\$48,382.22
NUMERICAL INTEGRATIONS	1	01/23/98	\$625.34	\$49,007.56
CLINICA SANTA MARIA	1	01/29/98	\$681.49	\$49,689.05
BETTEN TOYOTA	1	02/06/98	\$3,662.57	\$53,351.62
GEORGETOWN CHARTER TOWNSHIP	1	02/06/98	\$9,960.38	\$53,351.62
RAPISTAN SYSTEMS DIVISION OF M	2	02/10/98	\$900.30	\$54,251.92
CARPENTER ENTERPRISES LTD	1	02/11/98	\$922.80	\$55,174.72
FIRST ASSEMBLY OF GOD	1	02/11/98	\$1,847.52	\$57,022.24
GEORGETOWN CHARTER TOWNSHIP	1	02/11/98	\$9,481.99	\$66,504.23
ST MARY'S BROWNING CLAYTOR CE	1	02/11/98	\$2,363.65	\$68,867.88
MICHIGAN STATE UNIVERSITY	365	02/13/98	\$3,880.26	\$72,748.14
RVP DBA/GOLFTOWN	2	02/13/98	\$1,451.05	\$72,748.14
DELTA PLEX ENTERTAINMNT & EXPO	1	02/16/98	\$3,960.00	\$76,708.14
MACATAWA BANK	10	02/17/98	\$1,131.57	\$77,839.71
TRANS-MATIC	1	02/24/98	\$1,126.43	\$78,966.14
VOSS, MICHAELS, LEE & ASSOCIAT	10	02/25/98	\$546.57	\$79,512.71
ALLIED COLLECTION GROUP	6	02/26/98	\$7,645.28	\$79,512.71
DRIVER'S MART WORLDWIDE	13	02/27/98	\$830.72	\$80,343.43
AMERIBANK (DATA)	1	03/04/98	\$1,686.42	\$82,029.85
BAAN BUSINESS INNOVATION AMERI	4	03/06/98	\$1,439.52	\$83,469.37
INFINITY ONLINE SERVICES INC.	2	03/06/98	\$1,895.02	\$83,469.37
BAAN INTERNATIONAL	3	03/11/98	\$918.80	\$84,388.17
ROSCAM CONSTRUCTION			\$3,439.99	\$84,388.17

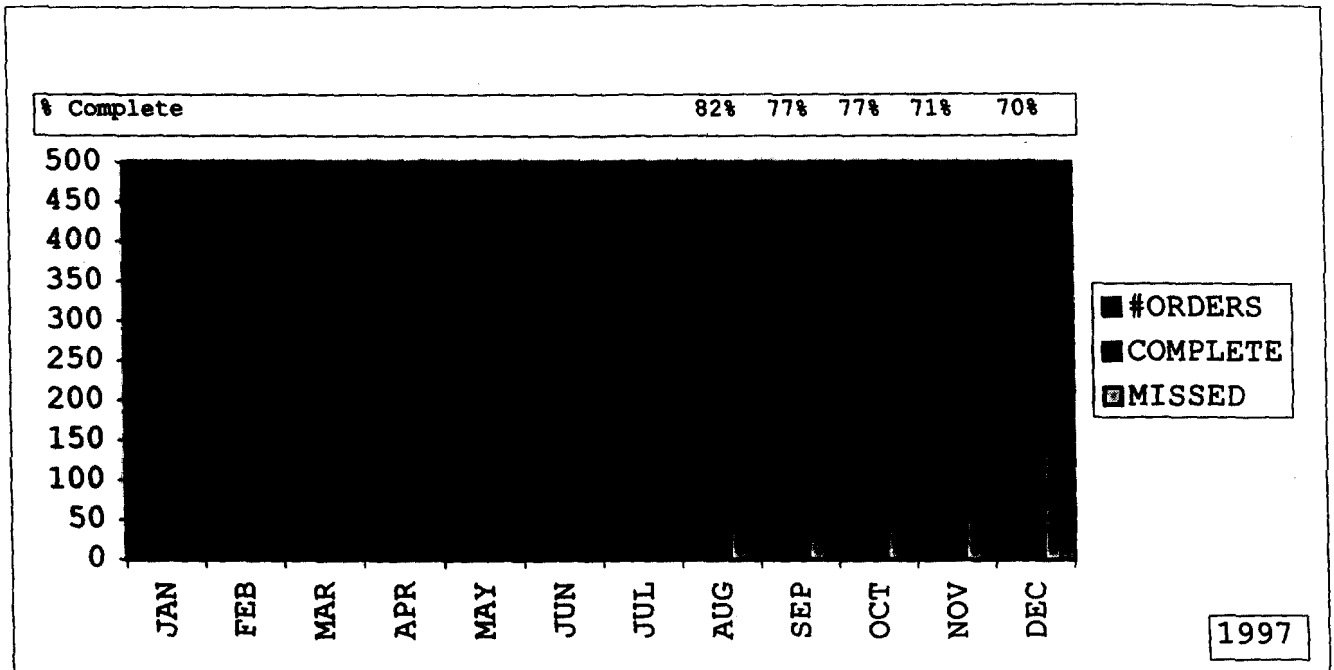
## Ameritech Unbundled Loop Report



### Breakdown of Missed Orders for January 1998:

No Facilities Available	3
Integrated SLCC	0
No Technician Available	1
Heavy Trouble	0
Unsafe Conditions Exist	0
Weather Conditions	0
Work Load	11
Other-See Comments	36
Exceeded 60 Min. conversion	15
NDT on Turn-Up	3
Conversion Started Early	0
Order Incorrect	0
Force & Load	34
Bad Cable Pairs	0
C.O. Trouble	1
NDT On Turn-Up/In	17
NDT On Turn-Up/Out	22
<b>Total Number of Missed Orders</b>	<b>143</b>
 Total Number of Orders	 418
Total Number of Completed Orders	275

# Ameritech Unbundled Loop Report



January 1998

BFC Order	BFC PON	AMI Order	Reason	Comments
971231413	980102063	C2014414461	No Facilities Available	Held for facilities
971208181	971215294	C2014415019	No Facilities Available	Bean job
971228519	971231385	C2014414447	No Facilities Available	Held for facilities
971208308	971222351	C2014385468	No Technician Available	Requested tech on 1/20 received one on 1/27
971217058	971219078	C2014405724	Work Load	Missed due to work load
980105289	980109094	C2014414541	Work Load	Missed due to work load
980107110	980108385	C2014411144	Work Load	Missed due to work load
980102041	980107429	C2014416522	Work Load	Missed due to work load
971218180	971219377	C2014348404	Work Load	Missed due to work load
971216162	971217426	C2014412084	Work Load	Missed due to work load
971231224	980107394	C2014405432	Work Load	Missed due to work load
971218268	971219367	C2014348406	Work Load	Missed due to work load
971219124	980107276	C2014411478	Work Load	Missed due to work load
971204321	971208007	C2014385606	Work Load	Missed due to work load
971216303	980109085	C2014411524	Work Load	Missed due to work load
971230357	980102097	C2014414463	Other	Completion called in 1/9/98
971224077	971229219	C2014386226	Other	Completion called in 1/7/98
980105093	980108183	C2014378880	Other	Completion called in 1/16/98
980115048	980121426	C2014378127	Other	Completion called in 1/29/98
980115284	980120004	C2014387813	Other	Completion called in 1/28/98
971118036	971222005	C2014386203	Other	Order held because of pending Ami orders
980107071	980112364	C2014414082	Other	Completion received 1/21/98
980107284	980108206	C2014387778	Other	Completion received 1/20/98
980113332	980119087	C2014416553	Other	Completion received 1/28/98
980114388	980116167	C2014387806	Other	Completion received 1/27/98
971224014	971229427	C2014412099	Other	Completion received 1/9/98
971231471	980102051	C2014387579	Other	Completion received 1/14/98
980102002	980105132	C2014405781	Other	Completion received 1/15/98
980107331	980108215	C2014412152	Other	Completion received 1/21/98
980108103	980108409	C2014386254	Other	Completion received 1/21/98
980115294	980116219	C2014416544	Other	Completion received 1/28/98
971118288	971223094	C2014414438	Other	Completion received 1/8/98
971230041	971231324	C2014414449	Other	Completion received 1/14/98
980113366	980115328	C2014416554	Other	MU011610 - Demarc tagged
971217099	971217327	C2014411397	Other	Completion received 1/5/98
971217184	971217382	C2014412086	Other	Completion received 1/5/98
971228561	971231418	C2014387572	Other	Completion received 1/15/98
980107074	980108365	C2014416315	Other	Completion received 1/26/98
971216285	971218258	C2014378848	Other	Completion received 1/8/98
971217324	971219039	C2014414051	Other	MU011052 - X-talk
971230496	980108273	C2014414482	Other	Completion received 1/23/98
971231586	980112231	C2014387783	Other	Completion received 1/29/98
971215092	980102003	C2014414968	Other	Ami ad order would be completed on 1/16, 1/21, 1/22, - Order completed on 1/26/98
971202039	971208100	C2014405338	Other	MU011412 - Needed demarc tagged
971223267	971229398	C2014411432	Other	Completion received 1/8/98
971231388	980102204	C2014414056	Other	Completion received 1/14/98

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BFC Order	BFC PON	AMI Order	Reason	Comments
971218260	971219382	C2014346403	Other	Completion received 1/6/98
971219144	971230126	C2014414434	Other	Told held for cable after FOC was received
971208425	971212407	C2014412951	Other	Completion received 1/7/98
971126272	971204457	C2014412923	Other	Bad cable pair
980109285	980116388	C2014415653	Other	Ami provisioned wrong - sent bck to engineering
971208010	971208305	C2014412945	Exceeded 60 Minutes	8:00 a.m. to 10:37 a.m.
971217396	980108312	C2014404040	Exceeded 60 Minutes	9:00 a.m. to 10:48 a.m.
971128019	980102315	C2014411117	Exceeded 60 Minutes	8:00 a.m. to 9:12 a.m.
980107154	980122297	C2014387829	Exceeded 60 Minutes	7:00 a.m. to 8:44 a.m.
971121013	971203263	C2014412946	Exceeded 60 Minutes	8:00 a.m. to 10:37 a.m.
971204346	971222396	C2014387746	Exceeded 60 Minutes	7:30 a.m. to 11:30 a.m.
971218035	980109161	C2014405929	Exceeded 60 Minutes	7:00 a.m. to 9:40 a.m.
971212084	980112330	C2014387784	Exceeded 60 Minutes	9:00 a.m. to 11:00 a.m.
971215209	980116092	C2014416547	Exceeded 60 Minutes	7:00 a.m. to 9:25 a.m.
971219030	980109331	C2014405930	Exceeded 60 Minutes	7:00 a.m. to 9:40 a.m.
980107210	980123215	C2014415679	Exceeded 60 Minutes	7:00 a.m. to 8:45 a.m.
971031330	971221089	C2014404946	Exceeded 60 Minutes	7:00 a.m. to 12:14 p.m.
971208088	980107076	C2014405926	Exceeded 60 Minutes	8:00 a.m. to 11:01 a.m.
971220120	971222431	C2014412088	Exceeded 60 Minutes	7:00 a.m. to 8:26 a.m.
971208205	971224082	C2014411430	Exceeded 60 Minutes	7:00 a.m. to 9:20 a.m.
971223002	971224047	C2014414060	NDT on Turn up	MU011305 - Open in C.O.
				MU011220 - Broken jumper in cross box
971223093	971230255	C2014411447	NDT on Turn up	MU011672 - Trouble in C.O.
				MU011622 - Jumpers in cross box
971120417	971201138	C2014346330	NDT on Turn up	MU011416 - Slice card replaced
				MU011417 - Coil missing
980108008	980106389	C2014414065	Central Office Trouble	C.O. work not completed on due date
980102050	980108466	C2014405434	NDT on Turn up/In	MU011216 - Jumpers replaced
980107025	980109224	C2014416518	NDT on Turn up/In	MU011392 - Jumpers missing in C.O.
981230139	971231615	C2014403738	NDT on Turn up/In	MU011215 - Reran jumper in C.O.
980107068	980107287	C2014405433	NDT on Turn up/In	MU011310 - Open in the C.O.
980113142	980114046	C2014416320	NDT on Turn up/In	MU011522 - Corrected wide splice on frame
971219041	971219362	C2014387559	NDT on Turn up/In	MU010911 - Changed cable pair at CFA
980119016	980119245	C2014414109	NDT on Turn up/In	MU011613 - Jumpers not run in C.O.
980108370	980112171	C2014387792	NDT on Turn up/In	Jumpered wrong in C.O.
980112119	980113300	C2014387793	NDT on Turn up/In	MU011582 - Twisted wire in C.O.
971223059	971224054	C2014378856	NDT on Turn up/In	MU011142 - Reran jumper in C.O.
971215032	971217032	C2014411985	NDT on Turn up/In	Jumpered 1 circuit in C.O.
980107362	980108119	C2014411486	NDT on Turn up/In	MU011728 - Ran missing jumper
980109170	980113147	C2014387788	NDT on Turn up/In	MU011570 - Wired wrong in the C.O.
971216421	971219062	C2014415777	NDT on Turn up/In	MU011092 - Finished installation of order
971223171	980102278	C2014404666	NDT on Turn up/In	MU011388 - Swing jumpers in C.O.
971219056	971222054	C2014414962	NDT on Turn up/In	MU010910 - Ami had wrong tie pair
971219427	980106165	C2014411127	NDT on Turn up/In	MU011224 - Replaced all coils
980107078	980112345	C2014415626	NDT on Turn up/Out	MU011336 - No jumper in x-box
980114403	980118019	C2014414096	NDT on Turn up/Out	MU011495 - Replaced aerial pair
980115320	980121041	C2014414113	NDT on Turn up/Out	MU011774 - Missing jumper at x-box

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BFC Order	BFC PON	AMI Order	Reason	Comments
980116359	980119255	C2014416298	NDT on Turn up/Out	MU011685 - Missing jumper at x-box
971218122	971219371	C2014346405	NDT on Turn up/Out	MU01036 & MU010924 - Installed aerial pair
971229411	980109130	C2014405107	NDT on Turn up/Out	MU011410 - Replaced underground
971229477	971231344	C2014378831	NDT on Turn up/Out	MU011212 - Installed drop
980116354	980116254	C2014387806	NDT on Turn up/Out	MU011768 - Wrong aerial pair
971218049	971219113	C2014413257	NDT on Turn up/Out	MU010841 - Aerial pair repaired
971229470	980108066	C2014387591	NDT on Turn up/Out	MU011393 - Aerial pair replaced
971231410	980102178	C2014386514	NDT on Turn up/Out	MU011249 - Aerial pair moved
971231586	980102230	C2014412112	NDT on Turn up/Out	MU011309 - Terminated to wrong cable pair
971209119	971211128	C2014414339	NDT on Turn up/Out	MU010849 - New jumper at x-box
971209038	971209293	C2014405984	NDT on Turn up/Out	MU010835 - Open jumper at x-box
971202041	971208030	C2014411055	NDT on Turn up/Out	MU010953 - New aerial and underground pair
971217346	971222081	C2014385472	NDT on Turn up/Out	MU010862 - Changed underground pair
971223108	971230158	C2014415307	NDT on Turn up/Out	Cable repaired after installation
971217038	971217301	C2014405707	NDT on Turn up/Out	MU010875 - Changed defective underground
971216173	971219331	C2014388491	NDT on Turn up/Out	MU011546 - Aerial pair replaced
971209094	971223138	C2014377210	NDT on Turn up/Out	MU011139 - Defective cable pair
971126296	971212353	C2014346375	NDT on Turn up/Out	MU010874 - New NI on side of building
971201308	971217347	C2014367268	NDT on Turn up/Out	MU010949 & MU010950 - New facility assigned
980120014	980122472	C2014415673	Force & Load	1/26/98 to 1/30/98
971218055	971219140	C2014412087	Force & Load	12/29/97 to 1/2/98
980109137	980116102	C2014405952	Force & Load	1/22/98 to 1/27/98
971216384	971218113	C2014386495	Force & Load	12/30/97 to 1/2/98
980107082	980108404	C2014411491	Force & Load	1/15/98 to 1/20/98
980107197	980108277	C2014418933	Force & Load	1/19/98 to 1/21/98
980115108	980116069	C2014405982	Force & Load	1/23/98 to 1/29/98
971118030	971223170	C2014405750	Force & Load	12/30/97 to 1/7/98
980108371	980108281	C2014414564	Force & Load	1/16/98 to 1/22/98
971217075	971218225	C2014414445	Force & Load	1/6/98 to 1/7/98
971231689	980108212	C2014411477	Force & Load	1/16/98 to 1/20/98
980105024	980108309	C2014414516	Force & Load	1/15/98 to 1/20/98
971219045	971219363	C2014413280	Force & Load	1/6/98 to 1/9/98
971217131	971223042	C2014414466	Force & Load	1/8/98 to 1/12/98
971218256	971224032	C2014367300	Force & Load	1/12/98 to 1/14/98
971223315	971224220	C2014405791	Force & Load	1/6/98 to 1/16/98
971203083	971205085	C2014385443	Force & Load	12/11/97 to 12/12/97
971217388	971222142	C2014414391	Force & Load	1/2/98 to 1/5/98
980108028	980108330	C2014404036	Force & Load	1/16/98 to 1/20/98
980116124	980116275	C2014405956	Force & Load	1/22/98 to 1/27/98
971209162	971219400	C2014414414	Force & Load	1/7/98 to 1/9/98
980112121	980113238	C2014387794	Force & Load	1/22/98 to 1/27/98
980114337	980119126	C2014387811	Force & Load	1/28/98 to 1/29/98
980119030	980119253	C2014416327	Force & Load	1/28/98 to 1/29/98
971111088	980108040	C2014412174	Force & Load	1/15/98 to 1/21/98
980108216	980112264	C2014414120	Force & Load	1/26/98 to 1/30/98
971222320	971223259	C2014414400	Force & Load	1/2/98 to 1/6/98
971215214	980108265	C2014416928	Force & Load	1/15/98 to 1/20/98

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BFC Order	BFC PON	AMI Order	Reason	Comments
980109157	980112275	C2014405935	Force & Load	1/22/98 to 1/26/98
971216321	980109152	C2014417746	Force & Load	1/21/98 to 1/27/98
971216339	971219095	C2014414048	Force & Load	1/7/98 to 1/8/98
971230590	980107241	C2014404991	Force & Load	1/13/98 to 1/20/98
971215230	980102235	C2014412133	Force & Load	1/12/98 to 1/14/98
971208123	971212072	C2014415040	Force & Load	1/20/98 to 1/22/98



**Press Release - Phone Michigan**  
**March 12, 1998**

Phone Michigan  
G-4074 S. Linden Rd.  
Flint, MI 48507

Jeff Snyder  
Director of Marketing  
800-350-1358

**Phone Michigan Charges Ameritech  
With Foul Play, Seeks Damages**

BRE Communications L.L.C., d/b/a Phone Michigan, today filed a complaint with the Michigan Public Service Commission (MPSC) charging Ameritech with "Planned Incompetence" in attempting to stifle local exchange competition in Michigan. Phone Michigan seeks damages in excess of \$3.3 million.

The complaint alleges that Ameritech violated both the Michigan and Federal Telecommunication Act and the Interconnection Agreement it had with Phone Michigan. Phone Michigan has charged Ameritech with the following:

1. **Failure to meet due dates** - Phone Michigan records demonstrate that Ameritech met its due date commitment less than 30% of the time in providing unbundled loops and number portability.
2. **Network Shortage** - Ameritech was blocking up to 50% of Ameritech customer's calls to Phone Michigan customers during busy hours.
3. **Network Quality** - Ameritech caused repeated outages on its services provided to Phone Michigan.
4. **Installation Quality** - Telephone customers endured significant service outages when they switched from Ameritech service to Phone Michigan service.

According to Phone Michigan's President, Brad Evans, "Michigan telephone customers cannot be held hostage to the self-serving, monopolistic tactics of Ameritech. Users and competitive providers must unite to insure the highest quality and lowest cost service is available to everyone. If Ameritech continues to ignore the law by setting their own rules, we will endeavor to make them liable for their arrogance."

Phone Michigan is Michigan's fastest growing, facility-based, competitive local exchange provider. With over 5,000 residential lines and over 9,000 total lines installed, Phone Michigan has demonstrated users want a choice. Phone Michigan specializes in providing services to the educational community. Phone Michigan's partnership with a consortium of 21 school districts in the Flint area (GenNet) provides high-speed data, interactive video, and advanced telephone service to over 80,000 students.



NEXTLINK EXCEL

ID	Task Name	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12	Week 13	Week 14	Week 15	Week 16	Week 17
1	Model Ameritech Request Timeline	-3															
2	NXL97035 - Various Cleveland CO Manhole Penetration Request																
3	NXL97038 - Bond Court Building Conduit Request																
4	NXL97023 - Thurman CO Conduit Request																
5	NXL97024 - Goodale Avenue Conduit Request																
6	NXL97025 - McCutcheon & Stebner Conduit Request																
7	NXL97027 - High & Marconiflickory & W. Long Conduit Request																
8	NXL97034 - E. Broad & McNaughten - Pole Attachment																
9	NXL97029 - Morse Road Extension to NXL97025																
10	NXL97030 - Reynoldsburg CO Manhole Penetration Request																
11	NXL97037 - SR3 from Schrock to SR161 Conduit Request																
12	NXL97036 - Reed Road Conduit Request																
13	TQW98003 - Tuller Road Conduit Request																
14	TQW98002 - Alley Northwest of Columbia Street																

AMERICAN TECH

Project: Ameritech Tracking.MPP  
Date: Wed 3/1/98

Actual Request

Ameritech Obligated Response Time

**AMERITECH REQUESTS CLEVELAND AND COLUMBUS STATUS SHEET**

**CLEVELAND**

Ameritech Number	Conduit, Pole, or Manhole Identification	Location	Initial Request Submitted	Ameritech Response Due	Ameritech Response Received	Days to Complete	Days Past Due	Description
TCW6004	Conduit Occupancy	Halls Building	2/10/00	2/20/00	2/20/00	10	0	Conduit Occupancy

**COLUMBUS**

Ameritech Number	Conduit, Pole, or Manhole Penetration	Location	Initial Request Submitted	Ameritech Response Due	Ameritech Response Received	Days to Complete	Days Past Due	Description
NOL97062	Conduit Occupancy	E. Mount & Livingston & S. Front & E. Peach	9/28/97	10/16/97	10/16/98	31	1	CUMSDH44 - On Hold
NOL97063	Conduit Occupancy	W. Main & S. Front & E. Peach	9/28/97	10/16/97	10/16/97	41	11	On Hold
NOL97064	Conduit Occupancy	W. Main & S. Front & E. Peach	10/16/97	10/16/98	Over due	65	35	On Hold
NOL97065	Pole Attachment	E. Mount & Livingston	10/28/97	10/28/98	3/2/98	60	30	Reynoldsburg 3.2 - Build Pending - m/h 20 to floor
NOL97066	Manhole Penetration	Reynoldsburg CO Meet Point	12/8/97	1/28/98	2/8/98	37	7	
NOL97067	Manhole Penetration	W. Main & S. Front & E. Peach	12/11/97	2/4/98	1/28/98	23	Not Available	Reynoldsburg 3.2 - Build Pending - m/h 20 to floor
NOL97068	Manhole Penetration	W. Main & S. Front & E. Peach	1/28/98	2/18/98	2/8/98	23	Not Available	
NOL97069	Manhole Penetration	Hilland CO Meet Point	2/11/98	3/25/98	Awaiting Response	20	Not Available	m/h number 28 - Awaiting Response

## A GLIMPSE INTO NEXTLINK OHIO'S EXPERIENCE WITH AMERITECH'S COMPLIANCE WITH §271 OF TA'96

<p><b>9-1-1</b>          -When NEXTLINK was first interconnected with Ameritech, our 9-1-1 trunks were "accidentally" disconnected during testing.          -Ameritech holding CLECs to specific design requirements with no reference to industry standard or rationale.</p>	<p>-Decrease random requirement for testing from 1 week to several hours. Place this requirement in the interconnection agreement(s).          NEXTLINK and Ameritech successfully tested 9-1-1 trunks over a several hour period.</p>	<p><b>OSS</b>          -NEXTLINK utilizes an Access Service Request (ASR) form for ordering unbundled loops. A Loop Service Request ("LSR") form is still not available from Ameritech.          -While NEXTLINK can use a dial-up interface for sending the ASRs, porting requests are still faxed.          -Approximately 80% of NEXTLINK's orders are rejected. This is due to Customer Service Records ("CSR") inaccuracies and other Ameritech billing record inaccuracies. The information contained in these formats are generally the only means of obtaining any past account/service history on a customer.          -Orders are canceled in Ameritech's systems without notification to NEXTLINK. The only reason we discover such cancellations are through specific inquiries on the specific accounts from NEXTLINK employees to the Ameritech account team.</p>	<p>-Ameritech should implement the LSR form. It will make the order process flow more accurate and timely.</p>
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Issues/Concerns (Current)	Next Steps	Comments	Recommendations
<p>-Delays experienced with Pole, Duct and Conduit space requests. The process for replying to such requests [aka "make ready" time] generally takes 30 days. On average, NEXTLINK is experiencing 50-60 day response time. Entire process can extend to 100 days. <b>See attached tables for specific examples.</b></p> <p>-Meet Point Manhole Process is not reliable. For example, NEXTLINK follows Ameritech's required meet point manhole process – which is the only avenue for connection to the applicable central office – only to find that there is to spare conduit in the manhood through which we can obtain connectivity to the central office.</p> <p>-Confirmation of available conduit is not reliable. For example, Ameritech indicates conduit is available; NEXTLINK pays Ameritech \$7,500 in make ready charges, Prior to NEXTLINK using the conduit, NEXTLINK is told that the conduit has "collapsed" and that it will cost another \$15,000 to fix the conduit.</p> <p>-The actual conduit request process is very difficult and constitutes a guessing game. For example, NEXTLINK submits a request for conduit, the response is "not available there."</p>	<p>Standardize and meet the standards for pole, duct and conduit requests. Penalize- through reduced make ready charges – if such standardized response times are not met.</p> <p>Provide diagrams, drawings, etc. or the meet-point manhole to CELC on a confidential basis so that both parties can be assured of available conduit. If a CLEC is told there is available conduit and there is not available conduit, Ameritech should be required to provide conduit on an expedited basis, with no associated charges.</p> <p>-Confirmation of available conduit should be binding. CLEC should not be required to pay for mistaken identification of available conduit. In addition, the charges and fees associated with conduit space and make ready work should be examined in detail.</p> <p>-More predictable process. Eliminate the time associated with guessing where conduit may be available. Provide conduit maps, on a confidential basis, so that the guessing game need not ensue.</p>	<p>-Ameritech often changes due dates for orders due to a variety of reasons, In Ohio, Ameritech has severe facilities problems and uses a "lack of facilities" for the many instances when the due date of an order is changed at the last minute. A few examples follow, although such experiences are NOT unique.</p> <p>1) Order CM – FOC received for due date of 1/16/98. On 1/15, Ameritech informed NEXTLINK (@ 5:00pm) that the order could not be delivered because there were no facilities (wires) on which to put these new lines. The soonest Ameritech claimed to be able to do so was 2/9. The first week of February, Ameritech informed NEXTLINK that there would be further delay because Ameritech had no "permit to dig". On 2/9, Ameritech informed NEXTLINK that there were facilities available and provided a FOC date of 2/12. On 2/12, NEXTLINK contacted the AIIS unbundling center which indicated that the order was complete. A NEXTLINK customer care representative and technician arrived at the customer site at 10 a.m. and no new lines were present. Escalation procedures began with AIIS at 11 a.m. An Ameritech technician did not arrive at the customer's premise until 4:15 p.m. Ameritech's technician - Mike – told our technician and customer care representative that "The guys were just sitting around in the CO and no one wanted to take this job."</p> <p>2) Order RI - Unbundled conversion</p>	<p>-Ameritech needs to be accountable for delay and for the lack of responsiveness on orders. While waiver of line connection charges per an interconnection agreement, is some incentive to eradicate such behavior, it is not enough.</p>

		<p>scheduled for 7 a.m. By 8 a.m. it was apparent to NEXTLINK that the lines were wired wrong in Ameritech's central office. A supervisor at the AIIS unbundling center disagreed with our assessment, claiming that the central office technician had tested the wires and they were wired correctly. After approximately 4 hours and 4 requests for the technician to check the wiring again, the unbundling center supervisor admitted that the technician had wired the Demarc incorrectly. The Ameritech technician had not followed our Carrier/Cable Facility Assignments ("CFAs").</p> <p>3) Order B - An unbundled loop conversion scheduled for 3/2. This date had been confirmed with Ameritech 5 times via fax and 2 times with an Ameritech tester from the unbundling center, who assured NEXTLINK that the order was confirmed. On the day of the conversion, NEXTLINK was informed that Ameritech would not be ready to do the conversion, since the translations were not ready.</p> <p>4) Technicians leaving for lunch in the middle of a conversion or leaving at 4:30 p.m., in the midst of a cut, because their shift has ended. There is no replacement for such technicians and, since the conversion is mid-stream, the end-user customer is expected to be without service until another Ameritech shift begins.</p>	
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Problem	NextLink	NextLink	NextLink
<p>Ameritech charges NEXTLINK for construction associated with unbundled loops.</p> <p>-Ameritech is submitting invoices for services rendered more than 6 months ago.</p> <p>-Ameritech is charging and billing for supplemented orders which were ordered to be supplemented by Ameritech, since Ameritech missed original due dates.</p> <p>-Volume discounts apply on the retail side but Ameritech will not provide such discounts on the unbundled side.</p> <p>-TELRIC prices STILL not in effect in Ohio.</p> <p>-CRIS bills are sent with no details nor explanation of charges. Although detail and explanation has been requested, such information has not been forthcoming in six months.</p>	<p>-No construction charges should be associated with unbundled loops.</p> <p>-Ameritech should treat CLECs as it would any other customer and submit invoices in a reasonable time frame.</p>	<p>-Supplemented orders are not flowing through all Ameritech centers associated with one CLEC conversion. Accordingly, customers' telephone service is often cut too early, leaving the end-user with no service. The explanation given is that NEXTLINK needs to complete its part of the job.</p> <p>-The numerous Ameritech centers associated with an installation/conversion do not communicate with each other. This affects pair assignments, translations, RCF, etc. Approximately 20% of NEXTLINK orders fail due to the lack of communication between and among centers.</p>	<p>-MAKE the various Ameritech centers communicate with one another to improve process flow, order accuracy and delivery of due dates.</p>
Problem	NextLink	NextLink	NextLink
<p>-Ameritech often ports numbers associated with a conversion to NEXTLINK service too early or too late. Thus, the end-user customer's telephone service is rendered ineffectual.</p>	<p>-If the various Ameritech centers communicated with each other, all information associated with one conversion/order will flow more accurately. Thus, the RCF associated with a conversion will occur accurately.</p>	<p>-NEXTLINK is experiencing terrible problems with directory listings. NEXTLINK has reason to believe there will be a substantial number of customers who will or have been omitted from the white pages directory listings. The process associated with Directory Listings often requires NEXTLINK to fax a directory listing form to Ameritech 10-12 times, in order to be assured that it is received. There is no confirmation process associated with receipt of an order. Reviewing and editing the proofs of the publication itself is currently the only means to see if customer information has been received by Ameritech and input into the upcoming directory. To the extent a correction, addition, deletion to the proof is forwarded to Ameritech, again</p>	<p>-Incent Ameritech to coordinate its relationship with its alleged affiliate in order to assure accurate order processing. There is NO accountability in this process. When AIIS is informed of any issues regarding directory listings, its standard response is "this is another subsidiary". When Ameritech is informed of problems, its standard response is "this is another subsidiary". The directory company itself is difficult to reach, non-responsive and has absolutely NO sense of urgency.</p>

		<p>there is no confirmation that such change is received by Ameritech. The burden rests entirely with the CLEC to chase down each and every directory listing form.</p> <p>-When accessing directory assistance, NEXTLINK customers have been told that the number they are trying to reach is not in the database or that, since they are a NEXTLINK customer, the requested information is not available. The customers of NEXTLINK subscribers have had similar experiences when trying to access the NEXTLINK subscriber.</p> <p>-NEXTLINK is being told that customers with certain numbers cannot be granted a VANITY number due to the customer's address.</p>	<p>-It is difficult to track the number of times Ameritech's DA causes a NEXTLINK customer trouble. We have encourage our customers to challenge the operators when they are told that a NEXTLINK number is not a working number. A more stringent means of holding Ameritech's feet to the fire will assist in ensuring the DA services provided are accurate and helpful</p>
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**Presentation of**

**ICG Communications, Inc.**

**To The**

**Federal Communications Commission**

**March 12 & 13, 1998**

*An ICG Communications Company*

50 Glenlake Parkway, Suite 500 • Atlanta, Georgia 30328 • 770-350-7300 • Fax: 770-350-7410